

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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Federal Communications Commission
Office of Secretary

In the Matter of)
)
Amendment of Section 73.622(b),)
Table of Allotments,)
Digital Television Broadcast Stations.)
(Anchorage, Alaska))

MB Docket No. 04-189
RM-10962

To: Marlene H. Dortch, Secretary
Office of FCC Secretary
Attn: Chief, Video Division
Media Bureau

COMMENTS IN SUPPORT OF NOTICE OF PROPOSED RULE MAKING

Alaska Public Telecommunications, Inc. (Alaska Public Telecom"), Channel 2 Broadcasting Company ("Channel 2"), and Smith Television License Holding, Inc. ("Smith") (Alaska Public Telecom, Channel 2 and Smith collectively, the "Joint Petitioners") hereby jointly comment in support of the Media Bureau's Notice of Proposed Rule Making adopted on May 13, 2004 and released on May 24, 2004, (DA 04-1349) in the above-captioned proceeding (the "NPRM").

By its NPRM, the Bureau has proposed to modify the DTV Table of Allotments in the following respects:

- KAKM-DT, which is owned by Alaska Public Telecom, would be constructed and operated on DTV Channel 8, with DTV power of 50 kW at an antenna height of 240 meters HAAT operating from coordinates 61-25-22 N and 149-52-20 W (the "F.A.M. Tower Site").

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- KTUU-DT, which is owned by Channel 2, would be constructed and operated on DTV Channel 10, with DTV power of 21 kW at the same antenna height of 240 meters HAAT operating from the same F.A.M. Tower Site.
- KIMO-DT, which is owned by Smith, would be constructed and operated on DTV Channel 12, with DTV power of 41 kW at an antenna height of 240 meters HAAT operating from the F.A.M. Tower Site.

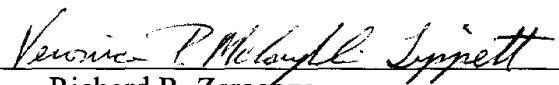
The record in this proceeding strongly supports both the substantive proposals contained in the NPRM, as well as the need to proceed as expeditiously as possible to finalize this proceeding. In an abundance of caution, the Joint Petitioners hereby incorporate by reference the pleadings they have filed, which comprise the current record in this proceeding.

Each of Alaska Public Telecom, Channel 2 and Smith hereby declares its intention to apply for modification of its current DTV construction permit consistent with the specifications set forth in the NPRM as soon as possible after the Commission releases the text of a Report and Order finalizing the modifications to the DTV Table of Allotments proposed in the NPRM. Furthermore, upon the grant of such modification applications, each of these Joint Petitioners hereby declares that it will take prompt steps to construct the DTV facilities proposed in its own modification application.

Based on the foregoing, the three Joint Petitioners hereby respectfully request that the Commission move expeditiously to issue a Report and Order (i) finalizing the modifications to the DTV Table of Allotments that have been proposed in the NPRM, and (ii) directing the filing of DTV modification applications by these Joint Petitioners.

Respectfully submitted,

Alaska Public Telecommunications, Inc.
Channel 2 Broadcasting Company
Smith Television License Holding, Inc.

By: 
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Dated: July 8, 2004